

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

KAMAIGA GHOLAR (18)
JAVEON FIELDS (20)
DARRIS LEE (39)
JAMES BATESON (48)
KATHERINE O'BRIEN (52)

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Criminal No. 24-cr-371-S

**UNITED STATES' OFFER OF TRIAL EXHIBITS
AND REQUEST FOR AUTHENTICATION PURSUANT TO LOCAL RULE CrLR 55.2**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the United States of America, by and through the United States Attorney for the Southern District of Texas, and the undersigned Assistant United States Attorney and hereby files this Offer of Trial Exhibits and Request for Authentication pursuant to Criminal Local Rule (“CrLR”) 55.2.

I.

The defendants, through counsel, were previously provided copies of discovery, including the items referenced in the paragraph below.

II.

The Government intends to authenticate, introduce, and offer exhibits included in the discovery pursuant to the local rules. First, Government exhibits include records of Harris County Jail calls made by the Defendants and/or co-conspirators and received by the Defendants and/or co-

conspirators. Said call records were kept and maintained in the ordinary course of business by the Harris County Jail. Second, Government exhibits include records of emails made by the Defendants and/or co-conspirators and received by the Defendants and/or co-conspirators. Said email records were kept and maintained in the ordinary course of business by the email providers. Third, Government exhibits include records of CashApp payments made by the Defendants and/or co-conspirators and received by the Defendants and/or co-conspirators. Said CashApp records were kept and maintained in the ordinary course of business. Fourth, Government exhibits include records of wire transmissions from AABLE Bail Bonds to Bond Pro Inc. Said records were kept and maintained in the ordinary course of business by Bond Pro, Inc. Finally, Government exhibits include employee records or results of employee record searches from companies, including American Auto Auction, Executive Cleaning Service, Baker Ripley, and On Purpose Life Enrichment Programs. Said records were kept and maintained in the ordinary course of business and/or were produced as a result of a search of records kept and maintained in the ordinary course of business by American Auto Auction, Executive Cleaning Service, Baker Ripley, and On Purpose Life Enrichment Programs.

III.

As referenced above, the exhibits were included in the discovery, accompanied by business records affidavits, and have been tendered to defense counsel.

Wherefore, the Government offers its exhibits and requests the defendant's compliance with CrLR 55.2.

Respectfully submitted,

NICHOLAS J. GANJEI
United States Attorney

s/ Michael E. Day
Michael E. Day
Assistant United States Attorney
SDTX: 1759502; SBN: 24080665

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **UNITED STATES' OFFER OF TRIAL EXHIBITS AND REQUEST FOR AUTHENTICATION PURSUANT TO LOCAL RULE CrLR 55.2** was filed with the District Clerk's Office and copies were mailed, faxed, e-mailed via ECF notification, or hand-delivered on the on the 15th day of September 2025 to counsel of record for the Defendants.

s/ Michael E. Day
Michael E. Day
Assistant United States Attorney